

To: William.H.Miller@usace.army.mil[William.H.Miller@usace.army.mil];
Sallie.Diebolt@usace.army.mil[Sallie.Diebolt@usace.army.mil]
Cc: Brush, Jason[Brush.Jason@epa.gov];
Scott_Richardson@fws.gov[Scott_Richardson@fws.gov]
From: Paula and Jeff
Sent: Tue 6/9/2015 4:05:35 AM
Subject: Please Evaluate Impacts to Vital Bird Habitats and Jurisdictional Waters by the Villages at Vigneto Development Proposal

Dear Mr. Miller and Ms. Diebolt,

I am writing to request that you please re-evaluate the Section 404 permit for the Villages at Vigneto ("Vigneto"), the large, Tuscany-inspired development proposed by El Dorado Benson, LLC

("El Dorado"), on over 12,000 acres of private land located south of Benson, AZ. Also, please begin consultation with the USFWS to quantify potential impacts of Vigneto to threatened and endangered species and ensure commitments to adequate conservation and mitigation measures.

The Vigneto plan should not be rubber-stamped just because the prior proposal for the Whetstone Ranch development was given the okay. The Villages at Vigneto is a new and different proposal that is larger and will have a far greater repercussions. Therefore, impacts to jurisdictional waters from this new proposal will be significantly different and should be re-evaluated.

The Villages at Vigneto pose a potential threat to vital conservation areas and tourist destinations, including the San Pedro Riparian National Conservation Area, two Globally Important Bird Areas on the San Pedro River, an EPA-designated Aquatic Resource of National Importance (ARNI), and the wet cave system at Kartchner Caverns State Park.

Also, wildlife dispersal linkages and habitat connectivity were not adequately considered in the analysis for the 2006 Whetstone Ranch Section 404 Permit. The southern half of Vigneto is located in Arizona Wildlife Linkage Zone 97, an important corridor for jaguar, ocelot, and numerous other species.

Furthermore, the USFWS was never formally consulted by Whetstone Ranch, El

Dorado, or the ACE regarding the potential impacts of the development to threatened and endangered species

and migratory birds. Therefore, consultation with the USFWS should be initiated.

The population explosion that will occur with this development will dramatically impact the environment surrounding Benson, and most likely significantly alter, if not outright harm, the San Pedro river system. Arizona is now in the 16th year of a drought and climate models are predicting future megadroughts. Approving this large a use of limited water without sufficient analysis could greatly jeopardize the future availability of water to communities along the San Pedro River, including Benson.

Again, I urge you to re-evaluate the 404 permit and to consult with the USFWS and EPA regarding Vigneto's impacts.

Thank you for considering my comments.

Sincerely,

Paula Hartgraves